

Martin Edward Ralls III Plaintiff

2:24-cv-156-TBM-RPM

Sheriff Jerry Wayne Mosely <sup>V.</sup> individually and in his official capacity  
et. alWayne County Jail and Detention Center administration  
et. al

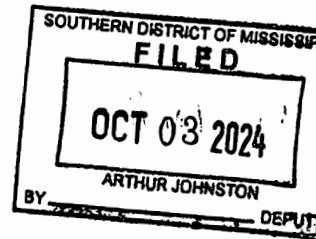
Dale Ivy, Eric Jones,

Maurice Davis, et. al Defendants

Individually and in their official capacities

Civil Action No: \_\_\_\_\_

Mississippi Southern Dist. Eastern Div. United States Court



This is a civil action authorized by 42 U.S.C. Section 1983 to redress the deprivation under color of state law of rights secured by the constitution of the United States. The court has jurisdiction under 28 U.S.C. Section 1331 and 1343, United States District Court Southern Mississippi Dist. Eastern Division.

Martin Edward Ralls III plaintiff seeks declaratory relief pursuant to 28 U.S.C. Section 2201 and 2202. Plaintiff claims for injunctive relief or authorized by 28 U.S.C. Section 2283 and 2284 and rule 65 of Federal Rules of Civil Procedure. Mississippi Southern District Eastern Division is appropriate venue under 28 U.S.C. Section 1391 Southern Mississippi District Court Eastern Division.

Martin Edward Ralls III is and at all times mentioned here in custody of Wayne County Jail and Detention Center. He is currently confined as a pretrial detainee @ Waynesboro, Ms Marvin Farrior Jail and Detention Center.

Jerry Wayne Mosely is responsible for overall activities and operations of Wayne County Jail and detention center Defendants or Employees/administration of Wayne County Jail Eric Jones and Dale Ivy. Maurice Davis is correctional officer of same.

### Complaint:

I Martin Edward Ralls will and can show that my 1<sup>st</sup>, 4<sup>th</sup>, 5<sup>th</sup>, 8<sup>th</sup> Amendment rights and in some cases still is or has been violated. There is substantial evidence of said violations. There will also be a set of interrogatories and request for some said evidence with (summons of evidence). Also a violation of 14<sup>th</sup> amendment

1 My arm got broke and for Major Nerve damage. Never got X-rays of it. Eric Jones Wayne County Assistant Jail Administrator Did violate My constitutional right of my 8<sup>th</sup> and 14<sup>th</sup> amendment right by stripping me Naked and did it in front of Trustees and female staff member/members as I was having a panic attack cause of new medications, power outage, and the fact I was told by female C.O. She didn't have anyway to open cell door because of said power outage and fact that administrators had keys and both work same shift, day shift w/o weekends. They stripped me at that time same as in case (Bennett v. Wayne County Civil Action No. 4:11-cv-1-FKB)

2 Dale Ivy Head Wayne County Jail Administrator. He sprayed me with Mace merely cause I was Hollering his Name and asking why was I being segregated. Not to mention that it was told to me that Sheriff Jerry Wayne Mosely said if he (speaking of me) so much as gets loud Spray him with mace and place him in the (Hole). (The Hole) being a concrete cell that has a hole in the floor for urination and Deviation with them having control of when it flushes. They also believe in stripping inmates of their clothes before putting inmates in there. Same as of case (Bennett v. Wayne County Civil Action No. 4:11-cv-1 - FKB S.D. Miss. April 08, 2013)

This was clearly a violation of my 1<sup>st</sup> amendment Constitutional right. Possibly 8<sup>th</sup> and 14<sup>th</sup> amendment right.

3 Sheriff Jerry Wayne Mosely issued a warrant for my arrest @ wrong address and not to mention using a battering ram to dis-lodge My dead dad's home which is my Mothers @ 122 Marty Ralls Dr. I resided @ 80 Marty Ralls Dr. and had since 1999. Not only that but he hired a private investigative company to watch my dad's home and mine. He admitted to Wayne County news and also at a Habeas Corpus Bond reduction in front of Judge and court reporter. Definatly admitting violation of Low Senate Bill 2022 Section 1 of 97-29-69

④ I had went to the dentist to get my wisdom tooth pulled and there was complications and I ended up in a very substantial amount of pain. Well I knocked on the windows because thats the only way to get someone to see what you want at Wayne County Jail and Detention Center because they have no cameras in the cell or intercoms in which is a major violation especially if you seriously need something and they don't ask no question they just tell you to come on and sometimes they let you keep your clothes but a lot of the times not. True statement as for Mr. Bennett Case:  
(Bennett v. Wayne County Jail and Detention Center  
Civil Action No. 4:11 CV1-EKB S.D. Miss. April 08, 2013)

Well they through me in (the Hole) Mental Health Cell #53. I called C.O. Maurice Davis to my cell in the (Hole) and explained to him that I had court that day @ lunch Time and dentist appointment @ 3<sup>rd</sup> meal which is sandwiches. I told him I just merely wanted my lunch and sandwiches or just one cause I haven't eating since 630 AM, and it was now around 8 PM. He told me that I was in jail because I was in trouble and He put me in the (Hole) for hitting the windows. Well I then explained to him I was prediabetic and he said he didn't care cause I was a inmate and was in trouble. I truly feel like my life could be in danger here sometimes.

Fact #

⑤ I allegedly escaped from Wayne County Jail. Well @ this time I'm in segregation. I have filled out grievances and Administration won't even answer them and it's all electronic. I have asked why am I being isolated without a R.V.R. much less an A.R.P.-1 or a A.R.P.-2, so how am I supposed to Exhaust my grievance system. They don't use a handbook much less a R.V.R. They just throw people in the hole are isolation. They have kept me in one cell segregated for over a month. I have no idea what's going on in the world. I haven't seen outside since then and they will not answer my grievances. How am I suppose to Exhaust the grievance system. Well from what I have read in Law Library and speak from other incident with different Staff at Wayne County Jail by administrator and Assistant that got fired from here for Contraband. Well anyway you can't get punished in the jail. Like segregation and/or loss of T.V, Yard time, visits, phones, and Be charged with the crime of escape or any other, charge that's Double Jeopardy and I even wrote a grievance on it, with no reply. Pure Violation of 5<sup>th</sup> amendment right. Also my 14<sup>th</sup> amendment right has been violated many times.



Mr. Jerry Wayne Mosely admitted to a 150 97-29-63 because

I have a 16 year old daughter and not to mention a 10 year old son of my fiancée. I have a Telescope with a phone attachment and I captured pictures of the Drone that the private investigative company used to capture me. Evidence will show that same drone that Wayne County Sheriff admitted to using was most definitely was same one that I got pictures of while my daughter and fiancée grandson was in our heated pool. Strictly a major violation of Peeping Tom Activities 97-29-63 which lawfully carries 10 years and/or \$5,000 dollar fine. The numbers off mine and my fiancée's phone match numbers of the drone they took pictures within the Wayne County News paper. We will be filing a lawsuit against said private investigative company's owner/insurance company. We will be pushing for charges against said private investigator. I also have 3 witnesses to said event @ our pool @ our home. Also not to mention said sheriff coerced with Judge Ralph Smith to set my bonds so high for such Extensive bails that of cash which is also a violation of my 8<sup>th</sup> amendment right too. Mr. Mosely didn't just violate my 4<sup>th</sup> amendment right but also involved himself in coercion of violation of my 8<sup>th</sup> amendment right but told Dale Ivy Wayne County Jail administrator to go ahead on a pure violation of my 1<sup>st</sup> amendment right. I also have filed with Commission of Judicial Performance as for the excessive bonds. He clearly violated my 4<sup>th</sup> amendment right. and accessory to all said events including violation of my 1<sup>st</sup>, 4<sup>th</sup>, 5<sup>th</sup>, 8<sup>th</sup>, and 14<sup>th</sup> amendment rights.

Prayer for Relief

Wherefore, plaintiffs respectfully pray that this court enter judgement:

Granting Plaintiff Martin Edward Ralls III a declaration that acts and omission describes herein violates his rights under the Constitution and laws of the United States, and A preliminary and permanent injunction ordering defendants Jerry Wayne Mosely, Dale Ivy, Eric Jones, Maurice Davis to stop Coercing against me and stop pretrial inmates in Mental Health Cell after Stripping of their clothes and humiliating and demeaning them.

Compensatory Damages in the amount of \$ 10,000.00 against each defendant, jointly and severally.

Punitive damages in the amount of \$ 5,000.00 against each defendant and amount of \$ 50,000 against defendant Jerry Wayne Mosely. \$50,000.00 from W.C.S.O.

A jury trial on all issues is triable by Jury.

Plaintiffs cost in this suit.

Any additional relief this court deems, proper, and equitable.

Dated: \_\_\_\_\_

Respectfully submitted: Martin Edward Ralls III 613 Court St. Wab, MS 39367

I have read the foregoing complaint and hereby verify that the matters alleged therein are true, as except to the matters alleged on information and belief and as to those, I believe them to be true. I certify under penalty and perjury that the foregoing is true and correct. Executed at Waynesboro, Mississippi on August 27, 2024

Martin E. Ralls III Plaintiff

